

Exhibit 13

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

Search Term
audit w/10 Tether
Tether w/10 transparency
"conflict of interest" or "conflicts of interest"
(2016 w/15 hack* OR theft* OR unauthorize* OR transfer* OR stolen) and (reserve* OR redem* or redeem*)
"ABT & Trust"
260011499
"Bank of America" OR BofA
898100395306
"Bank of Colorado"
5701063413
"Bank of Montreal"
"Bank of New York Mellon" OR "BNY Mellon"
BnkToTheFuture OR "Bnk to the Future"
"Bank of Communications"
"Banco Portuges de Investimento"
"Bank of the Philippine Islands"
2-5486163.306.001
Spoldzielczy
Kaohsiung
230510006385 OR 230509006380
Bankinter
Caixa
0216076478170 OR 0216076477370 OR 0216076476570 OR 0786071416230 OR 0786071414070 OR 0216076111170 OR 0216075956230 OR 0216076490070
"Canadian Imperial Bank of Commerce" OR CIBC
"CC001006882 5108411" OR "CC001006882 0374016" OR "CC001099702 4464710" OR "CC001099702 4113411" OR "CC001099702 4097513" OR "CC001099702 4210719"
Cathay
33087700408
Citibank OR Citi
207112962 OR 207129503 OR 207132333 OR 206618910 OR 207139809 OR 207139817 OR 207134933 OR 207132325 OR 207134958 OR 42024768923 OR 42001787749 OR 42024769061 OR 57457749 OR 9945530933 OR 207108689
Deltec

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

"Deutsche Bank"	
DE78660700240057016801 OR DE51660700240057016802 OR 192057016802	
"Enterprise Bank"	
1127548 OR 1241367 OR 1127564 OR 1127177 OR 1127193 OR 1128700 OR 1128727 OR 1127599 OR 1235784 OR 1127652 OR 1127644	
"First Commercial Bank"	
20386001075	
Hwatai	
3366000005573	
"HSBC Bank" OR "HSBC Securities" OR Pershing	
861668 OR 141000147	
ING	
"JP Morgan Chase" OR JPMC OR Chase	
296219550 OR 779558365	
KGI	
018580071208	
"Metropolitan Bank"	
"Noble Bank"	
"Pekao Bank"	
"Sackville Bank and Trust"	
Santander	
00080753 OR 10379431 OR 10446319 OR 10446322	
"Shanghai Pudong Development"	
"Signature Bank"	
"Stearns Bank"	
"Sun Trust"	
810455498 OR 209364251 OR 1000211769301	
"Shin Kong"	
0499128110518	
Taishin	
068760022865	
TCA Investment Bancorp & Trust Company	
"TD Bank"	
4350649188	
"US Bank"	
"Wells Fargo" OR WF	
2514680467	

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Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

"@bitfinexed"
"Authorized Tokens"
"bank account" w/5 (Tether or USDT)
"Bitcoin Management Solutions"
"Capital International"
"Capital Treasury"
"Celsius Network" or Celsius w/5 (invest* or investment*)
"Ching Shan"
"Crypto Capital" OR "Crypto SP. Z.O.O." or "Crypto SP ZOO" OR "Global Trading Solutions"
"Data Nest"
"don't have enough" w/5 (Tether OR USDT)
"El Salvador" OR Salvadoran
"Eligible Contract"
"End of month" or EOM
"Flash Crash"
"Friedman LLP"
"Galaxy Benchmark"
"Galaxy Digital"
"Global trading"
"Global Transaction Services"
"Hong Kong"
"Julius Baer"
"Jump Trading"
"Master Fund LP"
"Mega International"
"Mt. Gox"
"new Tether"
"Noble Markets"
"not 1:1"
"not enough" w/5 (tether or USDT)
"not tethered" OR un-tethered

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

"Paradise Papers"
"Paycase Financial"
"Potter Ventures"
"Price differential"
"price wall"
"Prosperity Revenue Merchandising"
"Quantifying the Effect of Tether"
"Schneider Wallace"
"Selendy" OR SG OR SGE
"Shyft Network"
"Smart Property Solutions"
("Tether Authorizer" OR Tether) w/5 authorization
"Tether Report"
("USDT" w/5 (equal* OR equat*)) w/15 (USD OR dollar*)
"USDT/USD" w/5 "trading pair"
"Virgin Islands"
("White paper" w/15 ("USDT" OR Tether OR token*)) w/15 (equat* OR back* OR equal* OR hold OR dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)
"Willy Report" OR "WillyBot"
“Article 78”
“Bitcoin Really Un-Tethered”
“bitcoin”
“cat and mouse”
“company fund*”
“Crypto Capital”
“fully back*” and “fully-back*”
“Global Trade Solutions” or GTS*
“investor relation*”
“not backed”
“price floor”
“private address*”
“realcoin*”
“Smart Property Solutions” or SPS*
("Class action" OR lawsuit) w/5 (Leibowitz OR Goldshtain OR Tether)

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Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

("Off exchange" OR "off-exchange" OR private OR "over-the-counter" or "over the counter" or "OTC") w/5 (transaction* OR arrangement* OR platform* OR exchange*)
("Treasury wallet**" OR "Tether treasury") w/15 Bitfinex w/15 (Tether OR "USDT")
("1:1" OR "one to one") w/15 (Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether)
("Know Your Customer" OR "know-your-customer" OR KYC OR "anti-money laundering" OR AML) w/15 (polic* OR procedur* OR complian* OR train OR Manual OR Notice)
((Account* OR Track* OR monitor* OR maintain*) w/15 ("USDT" OR Tether)) w/15 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* OR reserve* OR balance OR "commercial paper*")
(Account* OR Track* OR monitor* OR maintain*) w/15 ("USDT" OR Tether) w/15 (issu* OR redeem* OR redemption*)
(Agreement* OR contract*) w/25 (Bittrex OR Polo!)
Urriola OR (Ana w/2 Pan)
((Bolivar w/2 Jose) w/2 Gonzalez) OR (Bolivar w/2 Gonzalez)
(Bump* OR Crash* OR Drop* OR Jump* OR Spike* OR Floor) w/15 (price OR value OR Bitcoin OR BTC)
(Burn* OR giv* OR destroy*) w/15 ("USDT" OR Tether OR token)
(Data OR email) w/5 host* w/15 (polic* OR procedur* OR complian* OR train* OR Manual OR Notice)
(Document OR email) w/5 (retain or retention) w/15 (polic* OR procedur* OR complian* OR train* OR Manual)
(Investigat* OR inquir* OR Finding* OR report* OR case* OR audit*) w/15 ("New York AG" OR "New York Attorney General" OR "NY Attorney General" OR NYAG OR "NY AG" OR "Commodities Futures Trading Commission" OR CFTC OR (Dep* w/2 Justice) OR DOJ or "Exchange Commission" OR SEC
(Guarant* OR promis* OR assur*) w/15 ("1:1" OR "one to one" OR "1-1" OR tethered OR redeem* OR exchang*)
(Hamid w/2 Reza) OR (Hamid w/2 Khoyi)
(Inflat* OR capitaliz* OR spik* OR manipulat* OR stabiliz* OR floor OR return* OR Solven* OR use*) w/15 (bitcoin OR demand OR market* OR customer* OR price* OR valu*)
(Ivan w/2 (Manuel OR Molina OR Lee)
(mov* OR manipulat*) w/10 (price OR Market)
(Print* OR issu* OR creat*) w/15 ("USDT" OR Tether OR token)
(Raise* OR request*) w/5 (prospectus* OR "private placement" OR PPM OR solicit* OR invest*)

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

(Redeem* OR redempt*) w/10 ("USDT" or Tether OR token)
(Stablecoin OR "Stable coin" OR token OR "USDT" OR Tether) w/15 (equat* OR back* OR equal* OR hold*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR valu* OR reserve*)
(support w/3 price) w/3 (bitcoin OR BTC)
((Tether OR Bitfinex OR Digfinex) w/15 ("Crypto Capital" OR "Global Trade Solutions")) w/25 reserve* process* OR operat* OR manag*) OR transact* OR fiat* OR currenc*
(time OR Coordinat*) w/10 (mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)
((Track* OR monitor* OR maintain*) w/15 (polic* OR procedur* OR process* OR "manual process")) w/15 ("USDT" OR Tether OR reserv* OR account* OR issu* OR redeem* OR mint*)
(USDT OR Tether) w/5 address* w/15 (Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
@bitfinex
@brockpierce
1-to-1*
12cgpFdJViXbwHbhrA3TuW1EGnL25Zqc3P
13vHWR3iLsHeYwT42RnuKYNBoVPrKKZgRv
15ovrfyRTbhqeUkgAqAwtscXDASmietmcJ
16tg2RJuEPtZooy18Wxn2me2RhUdC94N7r
17A16QmavnUfCW11DAApiJxp7ARnxN5pGX
17sHnqeQcwvfPneJkmaTBAQEnQN82yi7ye
19-cv-09236*
19-mc-00022*
1A6yDZj1241qtGzEeQWRaptxVEhzz5owLP
1A9AUhKv6aLrKGAdwMM9aHXECZM9uQivZK
1AA6
1AA6iP6hrZfYiacfb3VS5JoyKeZZBEYRW
1AanEM2PU6GS7krwxaysKP3scwb3fdioyE
1CEZ4sjk7MuT3LSJi7bRvvbMZvGLWKCa1G
1Co1dhYDeF76DQyEyj4B5JdXF9J7TtfWWE
1DEcTtkrbdXxS1wbrMvzub5X4VpByYmAwo
1Dub2YYbQA1jjaNYzVXLZ7ZioEhLXtbUru
1F6nNgCTLcR4abWuMs1CHUWYNcnJ47tvbc
1Fdz3iQDDA6mJVoAV4ZcqgVFe1MX97EZoD
1G6jMfQotd6rV8VkMFNx4hPXYHioeBdquf
1GjgKbj69hDB7YPQF9KwPEy274jLzBKVLh

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

1H48Bp7EGELgnGSVYKdiCuSo6n822mVmHg
1Hi1hyJpUeETGBTQ8aPZ69GBL8xBVV53XP
1J1d
1J1dCYzS5EerUuJCJ6iJYVPytCMVLXrgM9
1J8fgfPwn4dsxLiA5BnUkzHoubPJ6q5q8g
1KBXtTQnEgU34xXchwmAoX7o5qZAp3xF
1Kr6QSydW9bFQG1mXiPNNu6WpJGmUa9i1g
1KYiKJEfdJtap9QX2v9BXJMpz2SfU4pgZw
1LJjvsEN9ZzeBVPB4XbhS7mxg99gBAPoMB
1LSgEKji3ZoGdvzBgkcJMej74iBd38fySb
1MZAayfFJ9Kki2csoYjFVRKHFFSkdoMLtX
1N52wHoVR79PMDishab2XmRHsbekCdGquK
1NTMakcgVwQpMdGxRQnFKyb3G1FAJysSz
1NUyryQe1cQYmqg5bjwWNFXA8T1M6htSQ
1PCwER7f57fkPq2kuR9rYV7Wpr1LYvFWsA
1Po1oWkD2LmodfkBYiAktwh76vkF93LKnh
20-mc-00063*
20-mc-00446*
20-mi-00042*
20-ms-00033*
3BbDtxBSjgfTRxaBUgR2JACWRukLKtZdiQ
3D2oetdNuZUqQHPJmcMDDHYoqkyNVsFk9r
3MbYQMMmSkC3AgWkj9FMo5LsPTW1zBTwXL
Adam w/2 Chamely
agree w/15 (flow OR USDT OR Tether OR mint* OR issu* OR Poloniex OR Bittrex OR Reggie OR Fowler)
AML
Amy w/2 Churchill
Anti-money
Arbitrage
Aron w/2 Camponovo
Artific* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)
Audit*
Back w/5 (tether or USDT)

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

Backfill*	
[Name of "Anonymous Trader"]	
Betts	
Binance	
Bitcointalk*	
(Bitfinex w/5 print*) w/5 Tether	
Bitfinex'ed	
Bitlicense	
Bittrex	
Bjorn w/3 Wolf	
Bloat*	
Blockchain.com	
Blockchain.info*	
Brock	
Brock w/2 Pierce	
Bubble w/15 (bitcoin OR market OR price)	
Bybit	
call w/3 (me OR you)	
Catastroph* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether* OR USDT OR drop* OR crash*)	
CC	
CCC	
CEA	
CFTC	
(Chris w/2 Ellis) AND (Tweet or twitter OR warrant OR subpoena)	
CoinAPI	
Coinbase	
Coindesk	
CoinDesk*	
Coinmarketcap.com*	
Commingl*	
Commission*	
Conspir* w/10 (Tether* OR USDT)	
Conspir* and (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)	
Control* w/15 (pric* OR BTC OR bitcoin OR flow OR Demand OR Market)	
Control* w/15 Bitfinex w/15 (Tether OR "USDT")	

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

Crash* w/10 (Tether* OR USDT)
Crash* /15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Crypto.com
Crypto* w/15 future*
CryptoCapital
D'Amico
Daniel w/2 Barrs
Dash*
Debas* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Debas* w/10 (Tether* OR USDT)
Deceit* w/15 (executive* OR CEO OR director* OR CFO OR Velde OR Ardoino OR Devasini OR Warrack OR Bitfinex* OR Potter)
Declin* w/10 (Tether* OR USDT)
Declin* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Defraud*
Delist*
Demand* w/10 (Tether* OR USDT)
Demand* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR artificial or appearance)
Destroy* OR Destruct*
DFS
Disconnect* w/15 (Supply OR Demand)
disrupt* w/10 (Tether* OR USDT)
disrupt* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
DOJ
Downturn* w/10 (Tether* OR USDT)
Downturn* w/15 (Price OR Demand OR Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Drop* w/10 (Tether* OR USDT)
Drop* /15 (Price OR Demand OR Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol*)
Epay* /15 (Bitcoin OR Bitcoin Cash OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Tether! OR USDT OR drop! OR crash!)

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

Ethereum* AND USDT
EURT*
Fals* w/15 (supply OR demand OR signal)
Fangorn
Fines /15 (regulat* or FTC or "Attorney General" or CFTC)
Fowler*
Fraud* AND USDT
Freeh w/2 Sporkin
FTX
Gemini
Gerald w/2 Martinez
Giancarlo OR Devasini
Griffin
Hack*
Heisenberg
https://tether.to/en/tether-update
https://tether.to/en/transparency
https://tether.to/faqs/
Huobi
Illegal* AND (trad* OR manipul* OR inflat*)
Indict* AND (Tether* OR USDT)
Inflat* AND (Bitcoin OR ether OR crypto*)
Insufficient w/5 (Tether OR USDT)
Investigat!
IOU
Jail
Kraken
KuCoin
Launder*
Leibowitz
Litecoin*
Loan
Loan AND USDT
Loan* w/10 (token OR "USDT" OR Tether)
LOC
Ludovicus OR Velde
Manipulat* AND (bitcoin OR ether*) AND USDT

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

MC-20-00018*	
Merlin*	
MEXC	
Michael w/2 Novogratz	
Mint* w/15 ("USDT" OR Tether OR token)	
Misrepresent* /15 (asset* OR backing OR reserve OR liquid*)	
Monero*	
Monopol*	
New w/5 (Tether OR USDT)	
Nocoin*	
OKEx	
Oliver w/2 Camponovo	
Omniexplorer.info*	
One-for-one	
Org* w/5 (chart OR structure)	
Oz w/2 Yosef	
Peg* w/5 (Tether OR USDT)	
Pinchas w/2 (Goldshtein OR Goldstein)	
Poloniex	
Ponzi	
Potter	
Print w/3 money	
print* w/5 (Tether or USDT)	
prop* w/3 up*	
Pump*	
Purchas* w/5 (Tether OR USDT)	
Realcoin w/15 (equat* OR back* OR equal*) w/25 (dollar* OR bank* OR account* OR fiat OR currenc* OR reserve* OR cash)	
Reggie OR Reginald OR Fowler	
Releas* w/5 (Tether OR USDT)	
Reserv* w/15 (cash or liquid or currency or sufficient or insufficient or paper or illiquid)	
Reserv* w/5 (Tether or USDT)	
Roche OR RCF OR RF	
Scam* /15 (USDT or Tether)	
SEC	
Skyrocket*	
(Spike* w/15 (demand or trad* OR price)) w/10 (Tether* OR USDT)	

*In re Tether and Bitfinex
Crypto Asset Litigation*

Plaintiff's Proposed Search terms

6/20/22

(Spike* w/15 (demand or trad* OR price)) w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR Drop* OR Crash*)
Suspicious* w/10 (Tether* OR USDT)
Suspicious* w/15 (Bitcoin OR BTC OR Omni OR Eth* OR Tron OR EOS OR Liquid* OR Algo* OR SLP OR Sol* OR spike or increase)
Tether w/2 (Pull* OR Push*)
Tether* w/3 ("Bank Account")
Tetherreport.com*
Tokenised or tokenized
TOPSUN
Trade* w/5 (Strategy OR Pattern)
Transfer* w/10 ("USDT" OR Tether OR token)
Transparen*
Un-tether*
Unauthorize*
Unback*
Undisclos* /15 (relationship or connection or tie* or arrangement)
Unfund*
Unilateral*
Unpredictabl*
Untether*
UpBit
Wash
Whalepool*
XT.com
Zcash*